



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 10**

1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

OFFICE OF  
ECOSYSTEMS, TRIBAL AND  
PUBLIC AFFAIRS

March 13, 2009

David Cobb  
Lakeview-Reeder Project Leader  
Priest Lake Ranger District  
32203 Highway 57  
Priest River, ID 83856

**RE: U.S. Environmental Protection Agency (EPA) review and comments for the U.S. Forest Service's Lakeview-Reeder Fuels Reduction Project Draft Environmental Impact Statement (DEIS). EPA Project Number: 06-073-AFS**

Dear Mr. Cobb:

This review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Under our policies and procedures, we evaluate the environmental impact of the proposed action and the adequacy of the impact statement.

EPA recognizes that fuels reduction projects in the Wildland Urban Interface can be the most effective means of mitigating the "fire exclusion spiral". The goals of this fuels reduction project are to: reduce hazardous forest fuels within the project area, decrease the risk of a wildfire negatively impacting communities (including 736 residences), improve forest health and reduce the threats from stand replacing wildfires and insect and disease infestations. To meet these goals the Idaho Panhandle National Forest (IPNF) proposes to, among other activities, treat fuels on approximately 3,864 acres, perform maintenance and reconstruction on 22 miles of roads and construct 3 miles of new road.

We have assigned an LO (Lack of Objections) rating to the Draft EIS (DEIS). A copy of the EPA rating system is enclosed. We especially support project mitigation measures such as the decommissioning of 24.5 miles of road and seasonal restrictions on project activities near Grizzly Bear habitat.

We offer the following comments and recommendations related to fish barriers, wildfire effects analysis and climate change as suggestions for inclusion in the Final EIS (FEIS).

**Fish Barriers**

Habitat fragmentation from fish barriers, of which the DEIS identifies 8 in the project area, can adversely impact aquatic resources. We commend the IPNF for proposing to improve fish passages on roads 308 and 1340A as part of this project and believe that improving the remaining 6 fish barriers would have important environmental benefits.

*Recommendation:*

To limit current and continuing adverse impacts from fish barriers we recommend that the remaining 6 fish barriers listed on page 2-34 of the DEIS also be improved as part of this project.

**Wildfire Effects Analysis**

We appreciate the complexity of analyzing wildfire impacts and commend the IPNF for their generally excellent analysis. However, the discussion in the DEIS does not clearly compare the watershed effects from high intensity wildfire under the no-action alternative to watershed effects from fires under the proposed action. For example, Figure 3-40 indicates that sediment increases in the Reeder watershed from the proposed action are far less than sediment increases that would occur in the case of an intense wildfire following no-action. The proposed action appears to assume absence of wildfire. We understand that the risk of high intensity wildfires is reduced under the proposed action. It would be helpful to understand the different wildfire impacts expected under each alternative.

*Recommendation:*

We recommend that the FEIS model and/or discuss the environmental effects of wildfire burning through the project area after the proposed action has been implemented in addition to the environmental effects of wildfire burning through the project area in the case of the no-action alternative.

**Climate Change Mitigation and Adaptation**

We appreciate the discussion in the DEIS on climate change's expected impact on wildfire patterns and frequency (DEIS, p. 3-93 and p. 3-100). Other likely impacts from an increased number of warm days and changes in the amounts and seasonal distributions of rainfall and snowpack include: altered water quantity and quality (e.g. temperature); timing of flow; spatial and temporal shifts of vegetative communities and wildlife habitat; potential increases for invasive species resistance to mitigation measures;<sup>1</sup> and increased opportunities for warm weather recreation.

To adapt to the above and other climate change impacts - as well as to mitigate climate change - EPA supports the recommendations and cited resources of the January 13, 2009 Forest Service initial guidance document, "Climate Change Considerations in Project Level NEPA Analysis".

*Recommendation:*

We recommend that the FEIS discuss effects of climate change on the project and the effects of the project on climate change. For the effects discussion of climate change on the project area we are especially interested in how the project's protection of connectivity, resilience and biodiversity anticipates likely climate change impacts.<sup>2</sup> For the effects discussion of the project on climate change we are interested in differences in

<sup>1</sup> [http://www.ars.usda.gov/research/publications/Publications.htm?seq\\_no\\_115=134271](http://www.ars.usda.gov/research/publications/Publications.htm?seq_no_115=134271)

<sup>2</sup> See, for example, "SAP 4.4. Adaptation Options for Climate-Sensitive Ecosystems and Resources | National Forests" at <http://www.climate-science.gov/Library/sap/sap4-4/final-report/sap4-4-final-report-Ch3-Forests.pdf> for additional information.



carbon storage and GHG emissions between the alternatives. We recommend the FEIS identify the market conditions that would make biomass utilization feasible. We also recommend that the FEIS and/or ROD include some indication of how climate change considerations (if any) have been weighed during decisionmaking.

Thank you for this opportunity to comment on the Proposed Action and if you have any questions please contact Erik Peterson of my staff at (206) 553-6382.

Sincerely,

/s/

Christine B. Reichgott, Manager  
Environmental Review and  
Sediment Management Unit

Enclosures:  
EPA Rating System for Draft EISs

**U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

**Environmental Impact of the Action**

**LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

**Adequacy of the Impact Statement**

**Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987